

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CIMC RAFFLES OFFSHORE (SINGAPORE)
PTE. LTD. AND YANTAI CIMC RAFFLES
OFFSHORE LIMITED,

Petitioners,

v.

SCHAHIN HOLDING S.A., SCHAHIN
ENGENHARIA S.A., SEA BISCUIT
INTERNATIONAL INC., BLACK GOLD
DRILLING LLC, BAERFIELD DRILLING LLC
AND SORATU DRILLING LLC,

Respondents.

13 Civ. 0052 (JSR)
ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Joseph P. Moodhe dated August 27, 2013, and the exhibit thereto, and all of the papers and proceedings had herein, Petitioners CIMC Raffles Offshore (Singapore) Pte. Limited and Yantai CIMC Raffles Offshore Limited will move this Court, before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York 10007, on September 9, 2013, at 4:30 p.m., or as soon thereafter as they may be heard, for an Order:

(a) Holding Respondents (other than Sea Biscuit International Inc.) in contempt of this Court's April 30, 2013, and August 6, 2013, Enforcement Orders;

(b) Directing Respondents (other than Sea Biscuit International Inc.) to pay a fine in the amount of \$500,000 per day for so long as they continue to fail to comply with the Enforcement Orders, the amount to be doubled and cumulated daily;

(c) Directing Respondents (other than Sea Biscuit International Inc.) to pay Petitioners' costs and reasonable attorney's fees in connection with bringing this motion; and

(d) Granting Petitioners such other and further relief as the Court finds just and proper.

PLEASE TAKE FURTHER NOTICE that opposition papers shall be due on September 3, 2013.

DEBEVOISE & PLIMPTON LLP

A handwritten signature in dark ink, appearing to read "J. Moodhe", is written over a horizontal line.

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